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June 17, 2024

Via Electronic Filing

Hon. Jessica S. Allen, U.S.M.J.
Martin Luther King, Jr. Federal Bldg.
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: Estate of Braswell v. Essex County, et al.
Docket No. 2:20-cv-15602**

Dear Judge Allen:

As you know, this firm represents Defendants, Abdullah Holmes, Ozzie Ryals, Gino Izzo (Ret.), Christopher Bozios, Jr. Edgar Silverio (Ret.), Yusef Ellis (Ret.), and Erik Udvarhely (referred to collectively as "Defendant Detectives"). We are scheduled for a Settlement Conference before Your Honor on July 12, 2024. Following the conference on May 24, 2024, Defendants conferred with Plaintiff regarding the settlement demand. Parties were not able to reach an understanding as to what constitutes a rational starting point for a settlement conference. As such, the parties respectfully request that an expert discovery schedule be set as follows:

- 1) Plaintiff shall serve expert reports no later than August 31, 2024;
- 2) Defendants shall serve expert reports no later than October 31, 2024;
- 3) Parties shall conduct expert depositions on or before November 29, 2024.

Further, Defendants respectfully request that the July 12, 2024, Settlement Conference be converted to a Case Management Conference.*

Thank you for your time and consideration in this matter.

***The request is GRANTED. As will be discussed during the 7/12/24 Status Conference by Video Conference, the in-person Settlement Conference is rescheduled for 11/14/24 at 10:00 a.m. in Courtroom 2B. All parties, party representatives, and/or insurance claims adjusters with ACTUAL AND FULL settlement authority are required to attend. The parties shall fax confidential settlement position papers of five (5) pages or less to Chambers (973-645-4549) on or before 11/12/24. The deadlines for completing expert depositions shall be held in abeyance, pending the outcome of the Settlement Conference. The Court will circulate the connection information in advance of the 7/12/24 Conference.**

June 17, 2024
Page 2

SO ORDERED

/s/ Jessica S. Allen
Hon. Jessica S. Allen, U.S.M.J.

Respectfully submitted,


Graham K. Staton

Date: 6/20/24

cc: All counsel of record via electronic filing